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IOWA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

March 7, 2023

Paul M. Leisher  
Leisher & Landsiedel P.C.  
P.O. Box 18071  
Missoula, MT 59808

David R. Paoli  
Paoli Law Firm, P.C.  
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James Young  
Juan Martinez  
Tim Fox  
Morgan & Morgan Complex Litigation Group  
76 S. Laura St., Suite 1100  
Jacksonville, FL 32202  
**VIA EMAIL AND CERTIFIED MAIL**

**Re: Notice of Termination of Special Counsel Agreement**

Dear Messrs. Leisher, Paoli, Young, Martinez, and Fox:

As you are aware, the Iowa District Court for Polk County recently ruled that the claims you were retained to litigate on the State of Iowa's behalf in *State v. Philip Morris, USA*, cannot be pursued in court and must be arbitrated. And after consultation with you, we have decided that it is not in the State's interest to continue to pursue these claims.

Because this litigation is now completed, under section II of the agreement for special counsel, the agreement shall terminate by its terms. But to the extent further clarity is helpful, pursuant to section XII(1)(b) of the agreement and any other authority under the law, the State also hereby terminates the agreement and your legal representation of the State effective 60 days after your receipt of this notice.

Sincere regards,

  
Samuel P. Langholz  
Chief Deputy Attorney General